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To: NCIC OPPT/DC/USEPA/US@EPA, ChemRTK HPV/DC/USEPA/US@EPA, Rtk
Chem/DC/USEPA/US@EPA, Karen Boswell/DC/USEPA/US@EPA, Ed.Kordoski@socma.com

cc:

Subject: Public comments

Attached please find the comments of the American animal protection community on SOCMA's HPV test plan.

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Federal Agency Liaison
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- HPV test plan comments -- Chlorobenzene.pdf

July 30, 2002

Christine Todd Whitman, Administrator
U. S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N. W.
Washington, DC 20460

Subject: Comments on the SOCMA's Chlorobenzene Category

Dear Administrator Whitman:

The following comments on the Synthetic Organic Chemical Manufacturers Association (SOCMA) test plan for the chlorobenzenes category are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

SOCMA's test plan for chlorobenzene addresses a logically circumscribed group of compounds and reflects a concise presentation of robust summaries. SOCMA intends to draw on existing data and correlate systematic structural changes with changes in toxicity for nearly all SIDS endpoints. We applaud the fact that they have included two well-characterized, non-HPV compounds with similar structures as surrogates to fully delineate the structure-activity relationships (SARs) of this group. It is important to note that the well-characterized compounds of this group both have chlorines substituted in a variety of positions, so that any uncertainty from the effects of differing substitution configurations (e.g. ortho, para, meta) are accounted for in any SAR interpretation.

While SOCMA has done an excellent job of developing a category, using SARs to elucidate chemical hazard, and fully characterizing the hazard associated with these compounds, we again encourage EPA to find ways to further promote this approach and include additional HPV chemicals under the same umbrella. For example, chlorotoluene compounds (whose robust summaries were originally posted by Occidental Chemical) should be included in this category as they only differ from these compounds by a single methyl group. With the small differences between compounds, these substances easily fit in this category as well.

The compounds listed in this category are already well understood¹ and are known to be relatively non-toxic. This category could easily be expanded to

¹ ATSDR 1990. Toxicological Profile for Chlorobenzene.



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THE RIGHTS OF ALL ANIMALS

form a larger category of chlorinated BTEX compounds, which have similar physical and chemical properties, as well as relatively low toxicities. If you have any questions, please contact me at 757- 622-7382, ext. 1304 or via e-mail at jessicas@peta.org.

Sincerely,

Jessica Sandler, MHS
Federal Agency Liaison